

## REMARKS

Reconsideration of the application is respectfully requested.

The application is directed at a process of making liquid laundry detergent compositions comprising of polyanionic ammonium surfactant.

Claims 1-20 were rejected under 35 U.S.C. 103(a) as being unpatentable over WO 00/63334.

Applicants respectfully traverse the rejection. WO '334 was cited at page 1, line 21 of the specification as an example of numerous disclosures in the art of mixtures of polyamines and anionic surfactants. Applicants do not dispute that such mixtures are known.

The present invention is based at least in part on the discovery that polyanionic ammonium surfactants (hereinafter "PAAS") employed in the present invention exhibit different characteristics and perform substantially better than physical mixtures of anionic surfactants and polyamines. See page 1, lines 27-30 of the specification. Applicants' invention employs a precursor of an anionic surfactant – see part (a1) of the claim – i.e. a conjugate acid of an anionic surfactant, which in and of itself is not a surfactant. Applicants employ this acid precursor and a polyamine to produce the PAAS which is a different entity from the physical mix of polyamines and anionic surfactants. In that respect, please note Example 1 and Comparative Example 1A at page 28 of the specification, demonstrating the differences in physical properties between PAAS vs. mixtures of polyamine and anionic surfactant as in WO '334. Also, please note Example 5 and Comparative Example 5A starting at page 33 of the specification which are directed to the differences in performance between PAAS formulation (Example 5) compared to anionic surfactant/polyamine mixture (Example 5A). See also differences in performance for the deposition of the fluorescent agent in Example 13 and

Comparative Example 13A starting at page 35 of the specification.

Thus, applicants' specification contains ample evidence of the criticality of employing applicants' process to produce a PAAS which is a different entity than a mere mixture of anionic surfactant and polyamine disclosed in WO '334. Applicants' invention is directed at the process which ensures the formation of the PAAS, i.e. reacting the precursor of anionic surfactant with polyamine in the substantial absence of bases other than the polyamine.

In light of the above amendments and remarks, it is respectfully requested that the rejection over WO '334 be reconsidered and withdrawn and the application be allowed to issue.

The Examiner objected to claim 7 of the specification. It appears, however, that this paragraph of the Office Action was erroneously included in this Office Action since claim 7 of the present specification does not refer to polycarboxylate polymers, nor does any other claim of this specification.

If a telephone conversation would be of assistance in advancing the prosecution of the present application, applicants' undersigned attorney invites the Examiner to telephone at the number provided.

Respectfully submitted,



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